

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

COACH, INC. and §
COACH SERVICES, INC., §
§
Plaintiffs §
§
VS. § CV-NO: 4:16-cv-3150
§
TRENDY TEXAS, LLC, BAIQ §
MAHMOOD, AN INDIVIDUAL AND §
MIRZA MOHAMMAD DAWOOD BAIQ, §
§
Defendants. §

ATTORNEY FEES AFFIDAVIT OF JOHN R. NELSON

STATE OF TEXAS §
§
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, personally appeared John R. Nelson, who, upon being sworn according to the law, did depose and state as follows:

1. My name is John R. Nelson. I am over (18) years of age, have never been convicted of a felony, and am not otherwise disqualified from making this Affidavit. I have personal knowledge of the facts stated in this Affidavit, and all the facts stated in it are true and based on my personal knowledge. I am authorized to make this Affidavit.

2. I am an attorney licensed to practice before all of the courts in the State of Texas and admitted to practice before this Court. I am a partner in the law firm of Locke Lord LLP, attorneys of record for plaintiffs Coach, Inc. and Coach Services, Inc. ("Plaintiffs"), in the above-entitled action. As the attorney at Locke Lord LLP with primary responsibility for the

representation of Plaintiffs in this matter, I have personal knowledge of the facts set forth below, and if called as a witness, I could testify truthfully to these facts.

3. I am familiar with the usual and customary fees charged in Texas for legal services such as those rendered in this case. I also am familiar with the reasonable and necessary attorneys' fees and expenses that have been incurred on behalf of Plaintiffs in connection with this lawsuit.

4. In prosecuting this lawsuit, I have researched and analyzed various investigative reports and documents regarding Defendant Trendy Texas LLC to determine the extent of its infringing activity and to advise Plaintiffs regarding their course of action; I have prepared Plaintiffs' Original and First Amended Complaint and related case initiating documents; I have obtained service of Plaintiffs' Original and Amended Complaint; I have spoken and corresponded numerous times with Defendant Trendy Texas LLC's owner regarding the lawsuit; I have prepared a Rule 55 Motion for Default Judgment after Defendant Trendy Texas LLC failed to answer or otherwise respond.

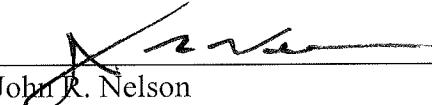
5. My work on this case through August 14, 2017 has taken 34.75 hours and my billing rate on this case is \$547.50 per hour. Plaintiffs have incurred \$650.00 in costs in connection with the service of process on Trendy Texas LLC. In sum, I have performed reasonable and necessary legal work worth \$19,025.62 in attorney's fees and \$650.00 in litigation costs. I anticipate that I will need to perform another 25 hours of reasonable and necessary legal work on this case if the Court grants Plaintiffs' Motion for Default Judgment and if that judgment is appealed to the Court of Appeals.

6. In my opinion, based upon my experience as a licensed attorney, all of the legal services that I performed were necessary to properly develop and pursue this lawsuit on behalf of

Plaintiffs, and the hourly rate described above is reasonable in the Austin, Texas area for the legal work that I have performed in this case.

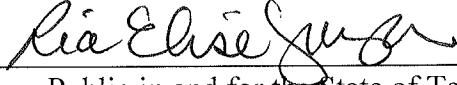
7. In determining that these attorneys' fees are necessary and reasonable, I have evaluated and relied upon the following factors: (a) the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly; (b) the likelihood that the acceptance of this particular employment would preclude other employment; (c) the fee customarily charged in Austin, Texas for similar services; (d) the amount involved and the results obtained; (e) the time limitations imposed by Plaintiffs or by the circumstances; (f) the nature and length of the professional relationship between Plaintiffs and Locke Lord LLP and its attorneys; (g) the experience, reputation and ability of the attorney involved; and (h) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.

FURTHER AFFIANT SAYETH NOT.



John R. Nelson

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this the 18th day of August, 2017.



Ria Elise Garza
Notary Public in and for the State of Texas

